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*Attorneys for Defendants
Irico Group Corp. and
Irico Display Devices Co., Ltd*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

**IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

**THIS DOCUMENT RELATES TO:
ALL INDIRECT PURCHASER
ACTIONS**

Master File No. 07-cv-05944-JST

MDL No. 1917

DECLARATION OF JAN DE LOMBAERDE

1 I, Jan De Lombaerde, declare as follows:

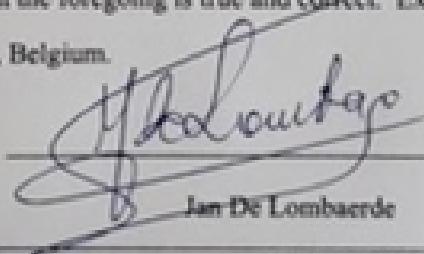
2 1. I am a former employee of various subsidiaries of Koninklijke Philips Electronics
3 ("Philips"). I worked at Philips from 1973 until my retirement in 2009, a period of 36 years in
4 total. If called as a witness, I could and would testify to the matters set forth in this declaration
5 of my own personal knowledge.

6 2. In October 2023, a lawyer contacted me in connection with the U.S. litigation
7 regarding Cathode Ray Tubes ("CRTs"). The lawyer indicated that they represented plaintiffs
8 in the CRT litigation but it was my impression that they were working on behalf of Philips. The
9 lawyer then asked me a number of questions regarding Irico, a Chinese supplier of CRTs and
10 asked if I would be willing to sign a declaration in connection my views on certain issues and in
11 relation to certain documents. Because I wanted to be helpful to Philips, I reviewed the draft
12 declaration, made a few small revisions, and signed the declaration. I then forwarded a
13 photograph of the signature page to the lawyer.

14 3. I recall that I was previously deposed in connection with the CRT litigation in
15 October of 2014, roughly five years after my retirement from Philips. At that deposition, I was
16 represented by lawyers for Philips. Those lawyers identified themselves on the record and stated
17 that they represented me. I recall that attorneys for the opposing party also were present at the
18 deposition and asked me many questions over the course of two days.

19 4. The lawyer who called recently, in October 2023, never asked me whether I was
20 still represented by attorneys for Philips or if I wished to continue to be represented by attorneys
21 for Philips. If they had asked, I would have stated that I did wish to continue to be represented
22 by attorneys for Philips. If I had realized that the lawyer was not acting on behalf of Philips, I
23 would have first contacted Philips lawyers before agreeing to cooperate.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed this
25 22nd day of November, 2023, in Tongeren, Belgium.



Jan De Lombaerde